

College of Physicians and Surgeons of Saskatchewan

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REGISTRAR: Karen Shaw, M.D.

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Dear Colleagues,

Guidance for physicians: Requests for COVID-19 vaccination exemptions

Given the number of organizations and agencies, provincially and nationally, that are imposing mandatory vaccination requirements, the College of Physicians and Surgeons of Saskatchewan has been receiving enquiries from physicians and patients regarding vaccine exemption letters.

The terminology of an "exemption" note may be misunderstood in the context of documenting contraindications to receiving a COVID-19 vaccination, as this would imply that the physician is declaring a patient free from an obligation or liability due to their unvaccinated status, which is not the purpose nor intent of such a note.

In appropriate circumstances, a physician may provide a letter to the patient to state that they have a contraindication to the COVID-19 vaccination, but they have to inform the patient that it is not considered a document which would permit them to have the same privileges which vaccinated persons have. Rather, it is a document which can be presented to the requesting agency or institution for consideration of how the unvaccinated person can be accommodated.

When considering such a letter or document, there are very few recognized absolute contraindications to the COVID-19 vaccination, for example:

- A physician (if possible, immunologist/allergist) confirmed severe allergy or anaphylactic reaction to a previous dose of a COVID-19 vaccine or to any of its components that cannot be mitigated;
- a diagnosed episode of myocarditis/pericarditis after receipt of an mRNA vaccine.

The Saskatchewan Ministry of Health document: Covid-19 Vaccine Contraindications background document can be used for reference.

Any note or letter provided to patients should include:

- the reason they cannot be vaccinated against COVID-19, with a description of an absolute or relative contraindication, and
- the time frame during which this would apply (i.e., permanent, time-limited, or indeterminate).

To serve the public by regulating the practice of medicine and guiding the profession to achieve the highest standards of care Similar messages have been issued by other regulatory organizations, for example the CPSO: Message regarding Vaccine Exemptions and the CPSA: Guidance for physicians Requests for COVID-19 vaccination exemptions

The CMPA provides guidance in the document: Exemptions from COVID-19 requirements and provides sound advice when stating:

"Physicians should exercise clinical judgment on a case-by-case basis in determining whether an exemption note is warranted based on the patient's medical condition and circumstances. Although physicians have a general obligation to help patients by providing medical reports or certificates when warranted, they are also responsible for giving sound medical advice.

Physicians should generally only complete these documents if the request is clinically indicated and in keeping with published guidelines. Any statements made should be truthful and based on objective clinical information.

It is reasonable to decline completing exemption notes if the request is not clinically indicated or you do not have the sufficient knowledge or expertise to opine on the issue. You should explain to the patient in a compassionate and professional manner why the request cannot be granted. An appropriate notation in the medical record of the discussion with the patient, including the basis for providing or refusing the exemption note, will be invaluable in responding to any later challenge of your decision."

Please contact the College if you have any questions or concerns.

Sincerely,

Dr. Werner Oberholzer

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